

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**CORTEZ D. BROWN, DEONTAE TATE,
and JEREMY S. MELTON on behalf of
themselves and all similarly situated persons,**

Plaintiffs,

v.

**Civil Action No.: 2:17-cv-02015
Jury Demanded**

**BILL OLDHAM, in his individual capacity
and in his official capacity as the Sheriff of
Shelby County, Tennessee; ROBERT
MOORE, in his individual capacity and in
his official capacity as the Jail Director of
the Shelby County, Tennessee; CHARLENE
McGHEE, in her individual capacity and in
her official capacity as the of Assistant Chief
Jail Security of Shelby County, Tennessee;
DEBRA HAMMONS, in her individual
capacity and in her official capacity as the
Assistant Chief of Jail Programs of Shelby
County, Tennessee; SHELBY COUNTY,
TENNESSEE, a Tennessee municipality;
and TYLER TECHNOLOGIES, INC., a
foreign corporation,**

Defendants.

**DECLARATION OF BETH BIVANS PETRONIO IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

I, Beth Bivans Petronio, hereby declare:

1. I am an attorney with the law firm K&L Gates LLP, 1717 Main Street, Suite 2800, Dallas, Texas 75201; (214) 939-5815. I am currently licensed, in good standing, and

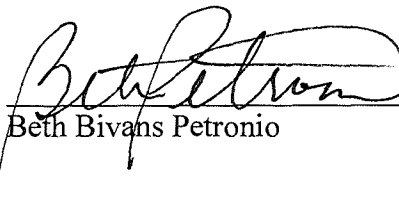
admitted to practice before the United States District Court for the Northern District of Texas. No disciplinary action or investigation of my conduct is pending. I have obtained a copy of, and am familiar with the Local Rules of this Court, including the Guidelines of Professional Courtesy and Conduct. I agree to subject myself to the jurisdiction of the courts of Tennessee in any matter arising out of my conduct in these proceedings and agree to be bound by the Code of Professional Responsibility applicable to Tennessee Lawyers and the interpretation thereof by Tennessee courts.

2. I am associated with Bradley E. Trammell, of the law firm Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C., who is licensed, in good standing, and resides and maintains a law office in the State of Tennessee.

3. I seek admission *pro hac vice* to the bar of this Court for the purposes of appearing and participating as counsel for Defendant, Tyler Technologies, Inc., in the above-styled action.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: February 13, 2017



Beth Bivans Petronio